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9 Attorneys for Complainant

10 **BEFORE THE**
CALIFORNIA BOARD OF ACCOUNTANCY
DEPARTMENT OF CONSUMER AFFAIRS
11 **STATE OF CALIFORNIA**

12
13 In the Matter of the Accusation Against:

14 ALEJANDRO SADY-KENNEDY
27758 Santa Margarita Parkway, Ste. 118
Mission Viejo, CA 92691

15 Certificate No. CPA 48081

16 Respondent.
17

Case No. AC-2007-26

**STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER**

18 1. Carol Sigmann (Complainant) is the Executive Officer of the California Board of
19 Accountancy (Board). She brought this action solely in her official capacity and is represented in
20 this matter by Edmund G. Brown Jr., Attorney General of the State of California, by G. Michael
21 German, Deputy Attorney General.

22 2. Respondent Alejandro Sady-Kennedy (Respondent) is representing himself in this
23 proceeding and has chosen not to exercise his right to be represented by counsel.

24 3. On or about May 29, 1987, the Board issued Certificate No. CPA 48081 to
25 Respondent. The Certificate expired on January 1, 2006.

26 JURISDICTION

27 4. Accusation No. AC-2007-26 was filed before the Board and is currently pending
28 against Respondent. The Accusation and all other statutorily required documents were properly

1 served on Respondent on June 8, 2007. A copy of Accusation No. AC-2007-26 is attached as
2 exhibit A and incorporated herein by reference.

3 ADVISEMENT AND WAIVERS

4 5. Respondent has carefully read and fully understands the charges and allegations in
5 Accusation No. AC-2007-26. Respondent has also carefully read and fully understands the
6 effects of this Stipulated Settlement and Disciplinary Order.

7 6. Respondent is fully aware of his legal rights in this matter, including the right to a
8 hearing on the charges and allegations in the Accusation; the right to be represented by counsel at
9 his own expense; the right to confront and cross-examine the witnesses against him; the right to
10 present evidence and to testify on his own behalf; the right to the issuance of subpoenas to
11 compel the attendance of witnesses and the production of documents; the right to reconsideration
12 and court review of an adverse decision; and all other rights accorded by the California
13 Administrative Procedure Act and other applicable laws.

14 7. Respondent voluntarily, knowingly, and intelligently waives and gives up each
15 and every right set forth above.

16 CULPABILITY

17 8. Respondent admits the truth of each and every charge and allegation contained in
18 the first and second causes for discipline in Accusation No. 2007-31.

19 9. Respondent agrees that his Certificate is subject to discipline and he agrees to be
20 bound by the Board's imposition of discipline as set forth in the Disciplinary Order below.

21 10. Respondent understands that by signing this stipulation he enables the Board to
22 issue an order revoking his license without further process.

23 CONTINGENCY

24 11. This stipulation shall be subject to approval by the Board. Respondent
25 understands and agrees that counsel for Complainant and the staff of the Board may
26 communicate directly with the Board regarding this stipulation and settlement, without notice to
27 or participation by Respondent. By signing the stipulation, Respondent understands and agrees
28 that he may not withdraw his agreement or seek to rescind the stipulation prior to the time the

1 Board considers and acts upon it. If the Board fails to adopt this stipulation as its Decision and
2 Order, the Stipulated Settlement and Disciplinary Order shall be of no force or effect, except for
3 this paragraph, it shall be inadmissible in any legal action between the parties, and the Board
4 shall not be disqualified from further action by having considered this matter.

5 OTHER MATTERS

6 12. The parties understand and agree that the costs of investigation and enforcement
7 of this disciplinary action (including Attorney General billing) total \$4,078.40 through June 22,
8 2007. These costs are the actual and total costs incurred by the Board to investigate and
9 prosecute the case. Respondent agrees to pay the Board \$1,000.00 of these costs of investigation
10 and enforcement within thirty (30) days of the effective date of the Decision and Order, by
11 making payment in certified funds to the California Board of Accountancy, 2000 Evergreen
12 Street, Suite 250, Sacramento, CA 95815-3832. The remaining \$3,078.40 is waived unless and
13 until Respondent seeks reinstatement of his Certificate or applies for a new Certificate with the
14 Board, at which time it shall be paid in full before the Board will consider Respondent's petition
15 for reinstatement or application for a new Certificate.

16 13. The parties understand and agree that facsimile copies of this Stipulated
17 Settlement and Disciplinary Order, including facsimile signatures thereto, shall have the same
18 force and effect as the originals.

19 14. In consideration of the foregoing admissions and stipulations, the parties agree
20 that the Board may, without further notice or formal proceeding, issue and enter the following
21 Disciplinary Order:

22 DISCIPLINARY ORDER

23 IT IS HEREBY ORDERED that Certificate No. CPA 48081 issued to Respondent
24 Alejandro Sady-Kennedy (Respondent) is revoked.

25 1. The revocation of Respondent's Certificate shall constitute the imposition of
26 discipline against Respondent. This stipulation constitutes a record of the discipline and shall
27 become a part of Respondent's license history with the Board.

3. Respondent shall cause to be delivered to the Board both its Registration wall and pocket license certificates on or before the effective date of the Decision and Order.

5. Respondent shall pay the Board \$1,000.00 of its costs of investigation and enforcement within thirty (30) days of the effective date of the Decision and Order, by making payment in certified funds to the California Board of Accountancy, 2000 Evergreen Street, Suite 250, Sacramento, CA 95815-3832. The remaining \$3,078.40 is waived unless and until Respondent seeks reinstatement of his Certificate or applies for a new Certificate with the Board, at which time it shall be paid in full before the Board will consider Respondent's petition for reinstatement or application for a new Certificate.

I have carefully read the above Stipulated Settlement and Disciplinary Order. I understand the stipulation and the effect it will have on my Certificate. I enter into this Stipulated Settlement and Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Board.

DATED:

6/26/07

ALEJANDRO SADY-KENNEDY
Respondent

1 ENDORSEMENT

2 The foregoing Stipulated Settlement and Disciplinary Order is hereby
3 respectfully submitted for consideration by the California Board of Accountancy.

4
5 DATED: June 26, 2007

EDMUND G. BROWN JR., Attorney General
of the State of California

7 G. Michael German
8 G. MICHAEL GERMAN
9 Deputy Attorney General

Attorneys for Complainant

10 DOJ Matter ID: SD2007800027
11 SADY-KENNEDY - Settlement Stip.wpd

**BEFORE THE
CALIFORNIA BOARD OF ACCOUNTANCY
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

Case No. AC-2007-26

ALEJANDRO SADY-KENNEDY
27758 Santa Margarita Parkway, Ste. 118
Mission Viejo, CA 92691

Certificate No. CPA 48081,

Respondent.

DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order is hereby adopted by the California Board of Accountancy as its Decision in this matter.

This Decision shall become effective on August 30, 2007.

It is so ORDERED July 31, 2007.



FOR THE CALIFORNIA BOARD OF ACCOUNTANCY

Exhibit A
Accusation No. AC-2007-26

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of the State of California
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Attorneys for Complainant

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CALIFORNIA BOARD OF ACCOUNTANCY
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA**

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Case No. AC-2007-26

ALEJANDRO SADY-KENNEDY
27758 Santa Margarita Parkway - Ste. 118
Mission Viejo, CA 92691

A C C U S A T I O N

Certificate No. CPA 48081

Respondent.

Complainant alleges:

PARTIES

1. Carol Sigmann (Complainant) brings this Accusation solely in her official capacity as the Executive Officer of the California Board of Accountancy (Board), Department of Consumer Affairs (Department).

2. On or about May 29, 1987, the Board issued certificate number 48081 (Certified Public Accountant) to Alejandro Sady-Kennedy (Respondent). The certificate was in full force and effect at all times relevant to the charges brought herein and expired on January 1, 2006.

JURISDICTION

3. This Accusation is brought before the Board and Department under the authority of the following laws. All section references are to the Business and Professions Code unless otherwise indicated.

1 4. Section 475 states, in pertinent part:

2 (a) Notwithstanding any other provisions of this code, the provisions of this
3 division shall govern the denial of licenses on the grounds of:

4

5 (2) Conviction of a crime.

6 (3) Commission of any act involving dishonesty, fraud or deceit with the
7 intent to substantially benefit himself or another, or substantially injure another.

8 (4) Commission of any act which, if done by a licentiate of the business or
9 profession in question, would be grounds for suspension or revocation of license.

10

11 5. Section 482 of the Code states:

12 Each board under the provisions of this code shall develop criteria to
13 evaluate the rehabilitation of a person when:

14 (a) Considering the denial of a license by the board under Section 480; or

15 (b) Considering suspension or revocation of a license under Section 490.

16 Each board shall take into account all competent evidence of rehabilitation
17 furnished by the applicant or licensee.

18 6. Section 490 of the Code states:

19 A board may suspend or revoke a license on the ground that the licensee has
20 been convicted of a crime, if the crime is substantially related to the qualifications,
21 functions, or duties of the business or profession for which the license was issued.
22 A conviction within the meaning of this section means a plea or verdict of guilty or
23 a conviction following a plea of nolo contendere. Any action which a board is
24 permitted to take following the establishment of a conviction may be taken when
25 the time for appeal has elapsed, or the judgment of conviction has been affirmed on
26 appeal, or when an order granting probation is made suspending the imposition of
27 sentence, irrespective of a subsequent order under the provisions of Section 1203.4
28 of the Penal Code.

29 7. Section 493 of the Code states:

30 Notwithstanding any other provision of law, in a proceeding conducted by
31 a board within the department pursuant to law to deny an application for a license
32 or to suspend or revoke a license or otherwise take disciplinary action against a
33 person who holds a license, upon the ground that the applicant or the licensee has
34 been convicted of a crime substantially related to the qualifications, functions, and
35 duties of the licensee in question, the record of conviction of the crime shall be
36 conclusive evidence of the fact that the conviction occurred, but only of that fact,
37 and the board may inquire into the circumstances surrounding the commission of
38 the crime in order to fix the degree of discipline or to determine if the conviction

1 is substantially related to the qualifications, functions, and duties of the licensee in
2 question.

3 As used in this section, "license" includes "certificate," "permit,"
4 "authority," and "registration."

5 8. Section 499 of the Code states:

6 A board may revoke, suspend, or otherwise restrict a license on the ground
7 that the licensee, in support of another person's application for license, knowingly
8 made a false statement of a material fact or knowingly omitted to state a material
9 fact to the board regarding the application.

10 9. Section 5063 of the Code states, in part pertinent:

11 (a) A licensee shall report to the board in writing of the occurrence of any
12 of the following events occurring on or after January 1, 1997, within 30 days of the
13 date the licensee has knowledge of these events:

14 (1) The conviction of the licensee of any of the following:

15 (A) A felony.

16 (B) Any crime related to the qualifications, functions, or duties of a public
17 accountant or certified public accountant, or to acts or activities in the course and
18 scope of the practice of public accountancy.

19 (C) Any crime involving theft, embezzlement, misappropriation of funds
20 or property, breach of a fiduciary responsibility, or the preparation, publication, or
21 dissemination of false, fraudulent, or materially misleading financial statements,
22 reports, or information.

23 As used in this section, a conviction includes the initial plea, verdict, or
24 finding of guilt, pleas of no contest, or pronouncement of sentence by a trial court
25 even though that conviction may not be final or sentence actually imposed until
26 appeals are exhausted.

27

28 (d) The report required by subdivisions (a), (b), and (c) shall be signed by
the licensee and set forth the facts which constitute the reportable event. If the
reportable event involves the action of an administrative agency or court, then the
report shall set forth the title of the matter, court or agency name, docket number,
and dates of occurrence of the reportable event.

. . . .

10. Section 5100 of the Code states, in part pertinent:

After notice and hearing the board may revoke, suspend, or refuse to renew
any permit or certificate granted under Article 4 (commencing with Section 5070)
and Article 5 (commencing with Section 5080), or may censure the holder of that
permit or certificate for unprofessional conduct that includes, but is not limited to,
one or any combination of the following causes:

1 (a) Conviction of any crime substantially related to the qualifications,
2 functions and duties of a certified public accountant or a public accountant.

3 (b) A violation of Section 478, 498, or 499 dealing with false statements or
4 omissions in the application for a license, in obtaining a certificate as a certified
5 public accountant, in obtaining registration under this chapter, or in obtaining a
6 permit to practice public accountancy under this chapter.

7 (c) Dishonesty, fraud, gross negligence, or repeated negligent acts committed
8 in the same or different engagements, for the same or different clients, or any
9 combination of engagements or clients, each resulting in a violation of applicable
10 professional standards that indicate a lack of competency in the practice of public
11 accountancy or in the performance of the bookkeeping operations described in
12 Section 5052.

13
14 (g) Willful violation of this chapter or any rule or regulation promulgated
15 by the board under the authority granted under this chapter.

16
17 (i) Fiscal dishonesty or breach of fiduciary responsibility of any kind.

18 (j) Knowing preparation, publication, or dissemination of false, fraudulent,
19 or materially misleading financial statements, reports, or information.

20 (k) Embezzlement, theft, misappropriation of funds or property, or obtaining
21 money, property, or other valuable consideration by fraudulent means or false pretenses.

22
23 11. Section 5106 of the Code states:

24 A plea or verdict of guilty or a conviction following a plea of nolo
25 contendere is deemed to be a conviction within the meaning of this article.
26 The record of the conviction shall be conclusive evidence thereof. The board
27 may order the certificate or permit suspended or revoked, or may decline to
28 issue a certificate or permit, when the time for appeal has elapsed, or the
judgment of conviction has been affirmed on appeal or when an order granting
probation is made, suspending the imposition of sentence, irrespective of a
subsequent order under the provisions of Section 1203.4 of the Penal Code
allowing such person to withdraw his plea of guilty and to enter a plea of not
guilty, or setting aside the verdict of guilty or dismissing the accusation,
information or indictment.

12. Sections 125.3 and 5107 of the Code together provide:

The executive officer of the board may request the administrative law
judge, as part of the proposed decision in a disciplinary proceeding, to direct
any holder of a permit or certificate found to have committed a violation or
violationis of this chapter to pay to the board all reasonable costs of investigation
and prosecution of the case, including, but not limited to, attorneys' fees. The
board shall not recovr costs incurred at the administrative hearing.

1 13. Title 16 California Code of Regulations (CCR) section 54.1 states:

2 (a) No confidential information obtained by a licensee, in his or her
3 professional capacity, concerning a client or a prospective client shall be disclosed
4 by the licensee without the written permission of the client or prospective client,
5 except for the following:

6 (1) disclosures made by a licensee in compliance with a subpoena or a
7 summons enforceable by order of a court;

8 (2) disclosures made by a licensee regarding a client or prospective client
9 to the extent that the licensee reasonably believes that it is necessary to maintain
10 or defend himself/herself in a legal proceeding initiated by that client or prospective
11 client;

12 (3) disclosures made by a licensee in response to an official inquiry from a
13 federal or state government regulatory agency;

14 (4) disclosures made by a licensee or a licensee's duly authorized representative
15 to another licensee in connection with a proposed sale or merger of the licensee's
16 professional practice;

17 (5) disclosures made by a licensee to (A) another licensee to the extent
18 necessary for purposes of professional consultation and to (B) professional
19 standards review, ethics or quality control peer review organizations;

20 (6) disclosures made when specifically required by law;

21 (7) disclosures made at the direct request of the client to a person or entity
22 that is designated by the client at the time of the request.

23 (b) In the event that confidential client information may be disclosed to
24 persons or entities outside the United States in connection with the services
25 provided, the licensee shall so inform the client in writing and obtain the client's
26 written permission for the disclosure.

27 14. Title 16 California Code of Regulations (Regulations) section 99 states:

28 For the purposes of denial, suspension, or revocation of a certificate or
permit pursuant to Division 1.5 (commencing with Section 475) of the Business
and Professions Code, a crime or act shall be considered to be substantially
related to the qualifications, functions or duties of a certified public accountant
or public accountant if to a substantial degree it evidences present or potential
unfitness of a certified public accountant or public accountant to perform the
functions authorized by his certificate or permit in a manner consistent with the
public health, safety, or welfare. Such crimes or acts shall include but not be
limited to those involving the following:

(a) Fiscal dishonesty or breach of fiduciary responsibility of any kind;

(b) Fraud or deceit in obtaining a certified public accountant's certificate
or a public accountant's permit under Chapter 1, Division III of the Business and
Professions Code;

(c) Dishonesty, fraud, or gross negligence in the practice of public

1 accountancy or in the performance of the bookkeeping operations described in
2 Section 5052 of the code;

3 (d) Violation of any of the provisions of Chapter 1, Division III of the
4 Business and Professions Code or willful violation of any rule or regulation of the
5 board.

6 15. Regulations, section 99.1 states:

7 When considering the denial of a certificate or permit under Section 480
8 of the Business and Professions Code, the suspension or revocation of a certificate
9 or permit or restoration of a revoked certificate under Section 11522 of the
10 Government Code, the board, in evaluating the rehabilitation of the applicant and
11 his present eligibility for a certificate or permit, will consider the following criteria:

12 (1) Nature and severity of the act(s) or offense(s).

13 (2) Criminal record and evidence of any act(s) committed subsequent to the
14 act(s) or offense(s) under consideration which also could be considered as grounds
15 for denial, suspension or revocation.

16 (3) The time that has elapsed since commission of the act(s) or offense(s)
17 referred to in subdivision (1) or (2).

18 (4) The extent to which the applicant or licensee has complied with any
19 terms of parole, probation, restitution, or any other sanctions lawfully imposed
20 against the applicant or licensee.

21 (5) If applicable, evidence of expungement proceedings pursuant to Section
22 1203.4 of the Penal Code.

23 (6) Evidence, if any, of rehabilitation submitted by the applicant or licensee.

24 **FIRST CAUSE FOR DISCIPLINE**

25 **(9-23-04 Conviction Bank Fraud, Wire Fraud & Money Laundering, from 1998 to 2004)**

26 16. Respondent is subject to discipline under sections 490 and 5100(a), in that he
27 sustained a criminal conviction that is substantially related to his qualifications, functions and
28 duties as an accountant. On or about September 23, 2004, in a criminal proceeding entitled
United States of America v. Alberto Mordoki, Mirella Mordoki, and Alejandro Sady-Kennedy in
the U.S. District Court for the Central District of California, Southern Division, Case Number SA
CR 04-063-DOC, Respondent was convicted by plea of guilty of violating Title 18, U.S. Code,
section 1344 [bank fraud], a felony; Title 18, U.S. Code, section 1343 [wire fraud], a felony; and
Title 18, U.S. Code, sections 1956(a)(1)(B) and 1956(a)(2)(b) [money laundering with intent to
conceal], a felony. The circumstances are as follows:

1 a. Beginning in at least 1998, and continuing to March 29, 2004, Respondent
2 in concert with three other defendants (collectively, "defendants"), knowingly and with the intent
3 to defraud, executed a scheme to obtain moneys owned by and in the custody and control of
4 federally-insured banks, by means of material false and fraudulent pretenses, representation, and
5 promises, and the concealment of material facts. Defendants used stolen or fraudulent identities
6 to pose as the buyers and sellers of real estate and as the real estate and loan brokers who were
7 handling the transactions. Defendants used real and fictitious companies to pose as employers and
8 landlords who would provide verification of the purported borrowers' employment, income and
9 rent history. Defendants used stolen or fraudulent identities to establish mail drops and phone
10 numbers to use as contact addresses and phone numbers for the fictitious borrowers, sellers,
11 employers, landlords, and real estate agents and brokers on loan applications. Defendants used
12 false W-2 forms and pay stubs in support of the loan applications. Defendants assembled the
13 fraudulent information described above to complete loan applications. These applications were
14 then submitted to various lenders. In many cases, defendants submitted these loan packages
15 posing as real estate brokers using the stolen identities of actual brokers. Defendants also posed
16 as real estate or loan agents using stolen or fabricated identities of loan agents and real estate
17 agents. After purchasing the properties, defendants frequently sold properties to themselves using
18 yet another stolen or fraudulent identity for the new purchaser. After several such sales,
19 defendants often took out a second mortgage on the property to exhaust all remaining equity. A
20 number of the properties that defendants purchased and sold eventually went into foreclosure
21 thereby causing financial losses to lenders.

22 Defendants took the proceeds from the loans, including any agent fees, commissions and
23 insurance payments, and deposited them into bank accounts established in the names of companies
24 controlled by defendants or in bank accounts opened in the names of individuals using stolen or
25 fraudulent identity information.

26 In furtherance of this scheme, Respondent executed or caused the execution of the
27 following:

- 28 1. In June 2001, the submission of W-2 forms and pay stubs that Respondent

1 knew were fraudulent in support of a loan application to D Trade Mortgage Corporation, a
2 federally insured financial institution, for the purchase of 1463 East 108th Street, Los Angeles,
3 California.

4 2. In October 2001, the wiring of proceeds to fund a second mortgage for
5 11305 Alvaro Street, Los Angeles, California, which mortgage Respondent knew was obtained
6 based on fraudulent information submitted to a lender.

7 3. On February 26, 2001, the issuance of check #396 in the amount of \$2,161
8 from account of E.H. American Mortgage Corp. at Bank of America to Ruben Lus, which check
9 Respondent knew represented the proceeds of the bank fraud and wire fraud scheme described
10 above, and the issuance of which was intended to conceal and disguise the nature, location,
11 source, ownership, and control of the proceeds of such specified unlawful activity.

12 The execution of the above described scheme over the course of many years required
13 the use of sophisticated means, and involved more than one victim. The above described scheme
14 to defraud affected a financial institution and Respondent derived more than \$1,000,000 in gross
15 proceeds from the offense.

16 b. Respondent is currently scheduled to be sentenced on June 25, 2007.

17 **SECOND CAUSE FOR DISCIPLINE**

18 **(Failure to Report Conviction)**

19 17. Respondent is subject to discipline under section 5063(a)(1)(A-C) in that he failed
20 to report his September 23, 2004 conviction, as detailed in paragraph 16, above, to the Board
21 within thirty days after it was entered by his guilty plea made that same date.

22 **THIRD CAUSE FOR DISCIPLINE**

23 **(Unprofessional Conduct - Violation of the Code)**

24 18. Respondent is subject to discipline under section 5100 in that between 1998 and
25 2004, he failed to comply with the following sections of the Code. Any one of these failures, or
26 any part thereof, is, in and of itself, a sufficient basis upon which to impose discipline.

27 a. **Section 5100(b):** Respondent knowingly made false statements of material
28 fact, or knowingly omitted to state a material fact, to the Contractor's State License Board

1 (CSLB) in support nine individuals' applications for licensure from the CSLB, by listing one of his
2 clients as the qualifier on those nine license applications, without having obtained his client's
3 consent to do so, in violation of section 499 of the Code.

4 b. **Section 5100(c):** Respondent acted with dishonesty, fraud, gross
5 negligence and in repeated negligent acts, in the same or different engagements, for the same or
6 different clients, or any combination of engagements or client, resulting in a violation of applicable
7 professional standards indicating a lack of competency in the practice of public accountancy, as
8 described in paragraph 16.

9 c. **Section 5100(i):** Respondent acted with fiscal dishonesty and breached his
10 fiduciary duties, as described in paragraph 16.

11 d. **Section 5100(j):** Respondent knowingly prepared, published and
12 disseminated false, fraudulent, and materially misleading financial statements, reports, and
13 information, as described in paragraph 16.

14 e. **Section 5100(k):** Respondent engaged in embezzlement, theft,
15 misappropriation of funds or property, and obtained money, property, or other valuable
16 consideration by fraudulent means or false pretenses, as described in paragraph 16.

17 **FOURTH CAUSE FOR DISCIPLINE**

18 **(Unprofessional Conduct - Violation of the Regulations)**

19 19. Respondent is subject to discipline under section 5100(g) in that between 1998
20 and 2004, he failed to comply with the section 54.1 of the Regulations, by wrongfully disclosing
21 confidential client information obtained by him without the written permission of that client, as
22 described in paragraph 18(a).

23 ///

24 ///

25 ///

26 ///

27 ///

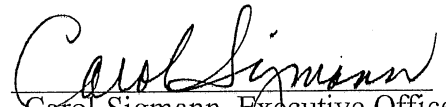
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1 PRAYER

2 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
3 and that following the hearing, the California Board of Accountancy issue a decision:

- 4 1. Revoking, suspending or otherwise imposing discipline upon Certified
5 Public Accountant Certificate Number 48081 issued to Alejandro Sady-Kennedy;
6 2. Awarding the Board costs as provided by statute; and,
7 3. Taking such other and further action as may be required.

8
9 DATED: May 29, 2007


Carol Sigmann, Executive Officer
California Board of Accountancy
Department of Consumer Affairs
State of California
Complainant